## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN DIVISION

United States District Court Southern District of Texas FILED

OCT 1 1 2016

UNITED STATES OF AMERICA

David J. Bradley, Clerk

v.
ABELARDO GOMEZ
CERENA CAMILLE ORTIZ

Criminal No.

M-16-1453

### **INDICTMENT**

#### THE GRAND JURY CHARGES:

### **Count One**

From on or about March 25, 2016, through on or about April 7, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

## ABELARDO GOMEZ and CERENA CAMILLE ORTIZ

conspired and agreed with each other, and others known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate and foreign commerce, individuals, knowing and in reckless disregard of the fact that said individuals had not attained the age of 18 years and that they would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1594(c), 1591(a)(1), (b)(2) and (c).

#### **Count Two**

From on or about March 25, 2016, through on or about April 7, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

# ABELARDO GOMEZ and CERENA CAMILLE ORTIZ

did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate and foreign commerce, Minor Victim 1, knowing and in reckless disregard of the fact that Minor Victim 1 had not attained the age of 18 years and that Minor Victim 1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c) and 2.

#### **Count Three**

From on or about March 25, 2016, through on or about April 7, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

## ABELARDO GOMEZ and CERENA CAMILLE ORTIZ

did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate and foreign commerce, Minor Victim 2, knowing and in reckless disregard of the fact that Minor Victim 2 had not attained the age of 18 years and that Minor Victim 2 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c) and 2.

A TRUE BILL

FOKEPERSÓN'

KENNETH MAGIDSON UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY